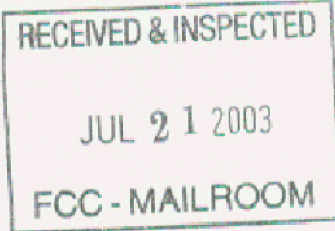


**Before the
Federal Communications Commission
Washington, D.C. 20554**



In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 03-77
Table of Allotments,)	RM-10660
FM Broadcast Stations.)	
(Ashland, Coaling, Cordova, Decatur,)	
Dora, Hackleburg, Hobson City, Holly Pond,)	
Killen, Midfield, Scottsboro, Sylacauga and)	
Tuscaloosa, Alabama, Atlanta, Georgia,)	
and Pulaski, Tennessee)	

MOTION FOR LEAVE TO FILE SUPPLEMENT

Kea Radio, Inc. ("KRI"), licensee of Station WKEA(FM), Scottsboro, Alabama, and Pulaski Broadcasting, Inc. ("PBI"), licensee of Station WKSR-FM, Pulaski, Tennessee, by counsel, hereby request acceptance and consideration of the accompanying Supplement in the above-captioned proceeding. The Supplement responds to new arguments that were raised for the first time by Cox Radio, Inc. and its wholly owned subsidiary CXR Holdings, Inc. (collectively, "Cox") in Cox's Reply Comments filed at the close of the comment period.

The Commission may authorize this supplement pursuant to § 1.415 (d) of the Rules. See, e.g., *Rose Hill, Trenton, Aurora and Ocrakoke, North Carolina*, 15 FCC Rcd 10739 at n. 2 (DA 00-1312) (rel. June 16, 2000) (consideration of supplement in order to complete the record); *Wallace, Idaho and Lolo, Montana*, 14 FCC Rcd 21110 at n. 1 (1999) (consideration of late-filed comments to enhance the record). Alternately, the Commission may consider this Supplement as an informal comment under § 1.419 (b). See, *Local Competition and Broadband Reporting*, 15 FCC Rcd 7717 at n. 21 (2000); *Revision of Filing Requirements*, 11 FCC Rcd 16326 at n. 7 (1996).

WHEREFORE, premises considered and for good cause shown, the Commission should accept

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and consider the accompanying Supplement in order to base its decision in this proceeding on a complete record.

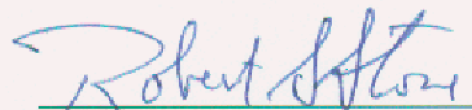
DATED this 18th day of July, 2003.

Respectfully Submitted,

KEA RADIO, INC.
PULASKI BROADCASTING, INC.

MCCAMPBELL & YOUNG, PC
Their Attorneys

By:


Robert S. Stone

MCCAMPBELL & YOUNG, PC
2021 First Tennessee Plaza
P.O. Box 550
Knoxville, TN 37901-0550
(865) 637-1440
(865) 546-9808 (telecopier)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion for Leave to File Supplement has been served on the following parties or their counsel, where indicated, on this the 18th day of July, 2003, by first class U. S. Mail, postage prepaid, as follows:

John A. Karousos
Audio Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A266
Washington, D.C. 20554

R. Barthen Gorman
Audio Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A224
Washington, D.C. 20554

Kevin F. Reed, Esq.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., N.W.
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Washington, D.C. 20036
(Attorney for Cox Radio, Inc. and
CXR Holdings, Inc.)

Larry D. Perry, Esq.
11464 Saga Lane
Knoxville, TN 37931
(Attorney for NCA, Inc.)

Erwin G. Krasnow, Esq.
Shook, Hardy & Bacon LLP
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005
(Attorney for New Century Radio, Inc.)

Steven A. Benefield, Esq.
Christian & Small, LLP
505 North 20th Street
Suite 1800
Birmingham, AL 34520
(Attorney for Voice of Cullman, L.L.C. and
Eddins Broadcasting, Co., Inc.)

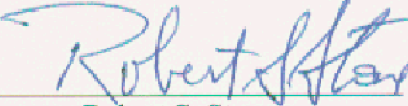
Walton E. Williams, Jr.
Williams Communications, Inc.
P.O. Box 788
Centre, AL 35983

Chris Williams
Queen of Peace Radio, Inc.
391 14th Avenue South
Jacksonville Beach, FL 32250

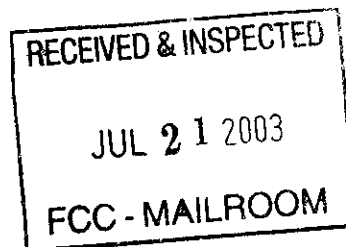
Ms. Penelope Nielsen
NCA, Inc.
287 Telephone Tower Road
Lacey's Springs, AL 35754

Houston Pearce
New Century Radio, Inc.
142 Skyland Boulevard
Tuscaloosa, AL 35405

Clark Jones
Voice of Cullman, L.L.C.
18 Co. Winstead Drive
Brentwood, TN 37037


Robert S. Stone

Before the
Federal Communications Commission
Washington, D.C. 20554



In the Matter of)	
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Amendment of Section 73.202(b),)	MM Docket No. 03-77
Table of Allotments,)	RM-10660
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Killen, Midfield, Scottsboro, Sylacauga and)	
Tuscaloosa, Alabama, Atlanta, Georgia,)	
and Pulaski, Tennessee)	

SUPPLEMENTAL COMMENTS

Kea Radio, Inc. ("KRI"), licensee of Station WKEA(FM), Scottsboro, Alabama, and Pulaski Broadcasting, Inc. ("PBI"), licensee of Station WKSR-FM, Pulaski, Tennessee, by counsel, hereby submit these Supplemental Comments to respond to the Reply Comments filed in the above-captioned proceeding. The Supplement responds to new arguments that were raised for the first time by Cox Radio, Inc. and its wholly owned subsidiary CXR Holdings, Inc. (collectively, "Cox") in Cox's Reply Comments filed at the close of the comment period.

1. Cox asserts that the Comments and Counterproposal filed in this proceeding by KRI and PBI (the "KRI/PBI Counterproposal") fail to comply with the city grade coverage and line-of-sight requirements of §73.315 of the Commission's Rules and do not include a *Tuck* analysis which Cox claims is necessary due to the extent to which the hypothetical site specified in the KRI/PBI Counterproposal would provide city grade coverage over the Florence, Alabama Urbanized Area. This Supplement is directed to those arguments.

2. Cox's argument relating to city grade coverage of Scottsboro, Alabama fails to take into

account both the nature of the area within the city limits of Scottsboro and the actual coverage which would be provided utilizing a tower supporting an antenna 150 meters above average terrain. As demonstrated by the attached technical report, KRI extensively investigated actual potential transmitter sites for its upgrade counterproposal before concluding that the site selected would provide full line-of-sight coverage over Scottsboro by building an antenna tower structure 150 meters above ground level. Consequently, Cox's arguments that the KRI site fails to satisfy such a requirement are misplaced.

3. The attached technical report also confirms that the selected Scottsboro transmitter site does in fact provide city grade coverage to the area disputed by Cox (which contains absolutely no population to begin with). Although the use of 72 radials toward the area in question shows the site provides city grade coverage to 98 percent of the area within the city boundaries of Scottsboro (and 100 percent of its population) without utilization of an alternate propagation signal methodology, an examination of the actual terrain along radials from the proposed site through the community of Scottsboro as part of an NBS Tech Note 101 study reveals full city grade coverage over the city.

4. KRI seeks to upgrade its own facilities on a co-channel, thus precluding the possibility of competing applications that could specify a different site. KRI has taken steps to assure the continued availability of the site specified in its counterproposal, which is in full compliance with FAA standards for the protection of nearby airports and related aviation facilities. The average elevations of terrain along the radials between KRI's specified site and the community of Scottsboro demonstrate enhanced signal coverage beyond that predicted when employing the Commission's standard methodology for predicting signal coverage. Because such terrain elevations vary widely from the average terrain in the area, use of the Tech Note 101 described is appropriate.

5. Cox's argument that 62 percent of the Florence/Sheffield/Muscle Shoals/Tuscumbia

urbanized area would receive a 70 dBu signal from the site specified in the KRI/PBI Counterproposal focuses on the site arbitrarily selected in order to demonstrate city grade coverage to the community of Killen, Alabama. Even if Cox's calculations as to penetration of the Florence/Sheffield/Muscle Shoals/Tuscumbia urbanized area are accurate, a site that is fully spaced and capable of providing city grade coverage to all of Killen can easily be selected whose 70 dBu signal would not penetrate the urbanized area so as to trigger the requirement of a full blown *Tuck* analysis. The attached technical exhibits conclusively demonstrate that such a site exists. Cox's *Tuck* related arguments are thus moot.

6. In any event, should the Commission determine that such an analysis is warranted in order to benefit from a complete record, the community of Killen is in fact independent from the Florence urbanized area for a number of reasons.

7. As already reported, Killen, Alabama is an incorporated city with a population of 1,118 persons according to the 2000 U.S. Census Bureau. It is governed by a mayor-board of alderman form of government and provides municipal services to its residents, including full-time police force, municipal court, parks and recreation and a volunteer fire department. It offers its own public library, community organizations, churches (Baptist, Methodist, Church of Christ and Apostolic Church) elementary and secondary educational institutions and numerous commercial outlets. The community is also served by the Killen Clinic which provides health care with staffed physicians. The Killen Post Office is also located within the city limits of Killen, whose zip code is 35645. Attached are materials provided by the city which further describe the community together with a sampling of viewpoints of community leaders and residents of the city which affirm its independence from Florence and other cities with the urbanized area.

8. Although the distance between Killen and the nearest point of the urbanized area which

includes Florence, Sheffield, Muscle Shoals and Tuscumbia, Alabama is only approximately five miles by air, the community is geographically separated by Shoals Creek, a large tributary to Wilson Lake, formed by Wilson Dam, which is in turn operated by the Tennessee Valley Authority, one of several employers in the area independent of Florence and other cities within the urbanized area in question. The vast majority of the city's residents who work outside of Killen work at the Browns Ferry Nuclear Plant ten miles west of Athens, Alabama, at various chemical plants along the Tennessee River west of Decatur, Alabama or supplying timber to paper mills to the east of Killen. There is a weekly newspaper published in the community, a downtown business area and at least 2 shopping centers. Thus, although the size and proximity of Killen to the Florence/Sheffield/Muscle Shoals/Tuscumbia urbanized area are pertinent, other factors which evidence the community's independence from the urbanized area are more significant. The aural services licensed to the urbanized area should not be attributed to Killen.

9. Finally, the attached technical report demonstrates the slight change in reference coordinates for Cox's proposed Ashland, Alabama channel 252 allotment which could accommodate all interested parties in this proceeding. KRI and PBI urge the Commission to consider this means of resolving the mutual exclusivity involved so as to allow new service to over 200,000 persons. Certainly, the Commission has the discretion and precedent to do so.

WHEREFORE, premises considered, Kea Radio, Inc. and Pulaski Broadcasting, Inc. respectfully urge the adoption of a Report and Order by the Commission amending the FM Table of Allotments consistent with the above.

Dated this 18th day of July, 2003.

Respectfully Submitted,

KEA RADIO, INC.
PULASKI BROADCASTING, INC.

McC Campbell & Young, PC
Their Attorneys

By: 
Robert S. Stone

MCCAMPBELL & YOUNG, PC
2021 First Tennessee Plaza
P.O. Box 550
Knoxville, TN 37901-0550
(865) 637-1440
(865) 546-9808 (telecopier)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Supplement has been served on the following parties or their counsel, where indicated, on this the 18th day of July, 2003, by first class United States Mail, postage prepaid, as follows:

John A. Karousos
Audio Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A266
Washington, D.C. 20554

R. Barthen Gorman
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Washington, D.C. 20005
(Attorney for New Century Radio, Inc.)

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505 North 20th Street
Suite 1800
Birmingham, AL 34520
(Attorney for Voice of Cullman, L.L.C. and
Eddins Broadcasting, Co., Inc.)

Walton E. Williams, Jr.
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Ms. Penelope Nielsen
NCA, Inc.
287 Telephone Tower Road
Lacey's Springs, AL 35754

Houston Pearce
New Century Radio, Inc.
142 Skyland Boulevard
Tuscaloosa, AL 35405

Clark Jones
Voice of Cullman, L.L.C.
18 Co. Winstead Drive
Brentwood, TN 37037

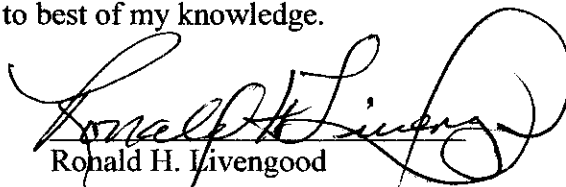

Robert S. Stone

DECLARATION

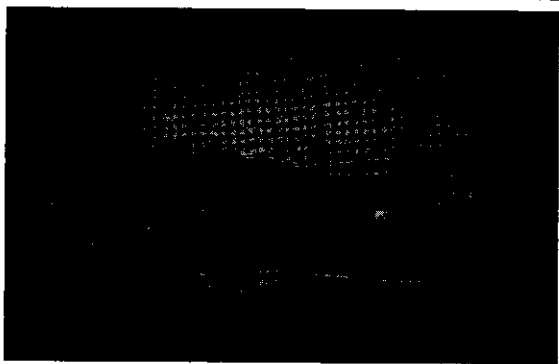
I, Ronald H. Livengood, hereby declare under penalty of perjury that I have reviewed the foregoing Supplemental Comments of Kea Radio, Inc. and Pulaski Broadcasting, Inc. and that the factual statements made therein are true and correct to best of my knowledge.

DATE: _____

7/14/03



Ronald H. Livengood



One of the four ballfields at Killen Park

BRIEF HISTORY OF KILLEN

Killen is located in the southeastern portion of Lauderdale County on Highway 72. The original owners of the land known as Killen were Dr. S.E. Cross and a Mr. Peden. In 1896, Mr. Sharp Killen applied to the Postal Department for a post office and the name Killen was selected.

During the building of the Muscle Shoals Canal, a number of new families moved into the area in the 1870's. In 1878, the paymaster at the canal, Alex Smith, was robbed of the canal worker's payroll by Jessie James.

Killen was incorporated in 1957. The population, according to the 1990 census, is 1047 people. The town now has a doctor, two dentists, several churches and small businesses.

The townspeople are especially proud of the park facilities located on Lock Six Road, which consists of four ballfields, tennis courts, picnic areas, playground and a lighted walking trail.

Welcome To

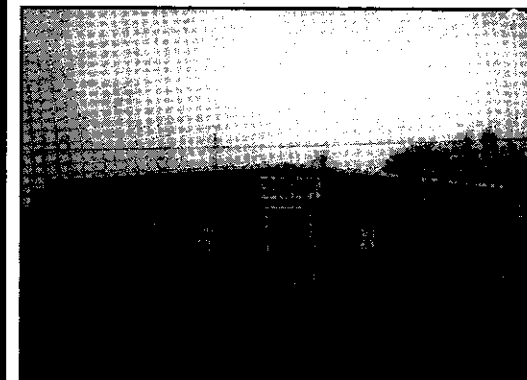
TOWN OF KILLEN



Old Killen Jr. High School

LAUDERDALE COUNTY

Alabama



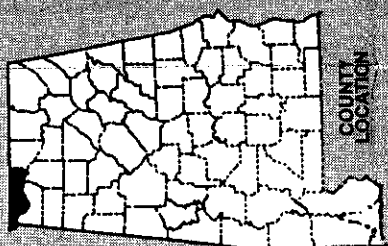
Killen Senior Citizens Center



Killen Center Star Rescue



Killen Fire Department



Killen Public Library

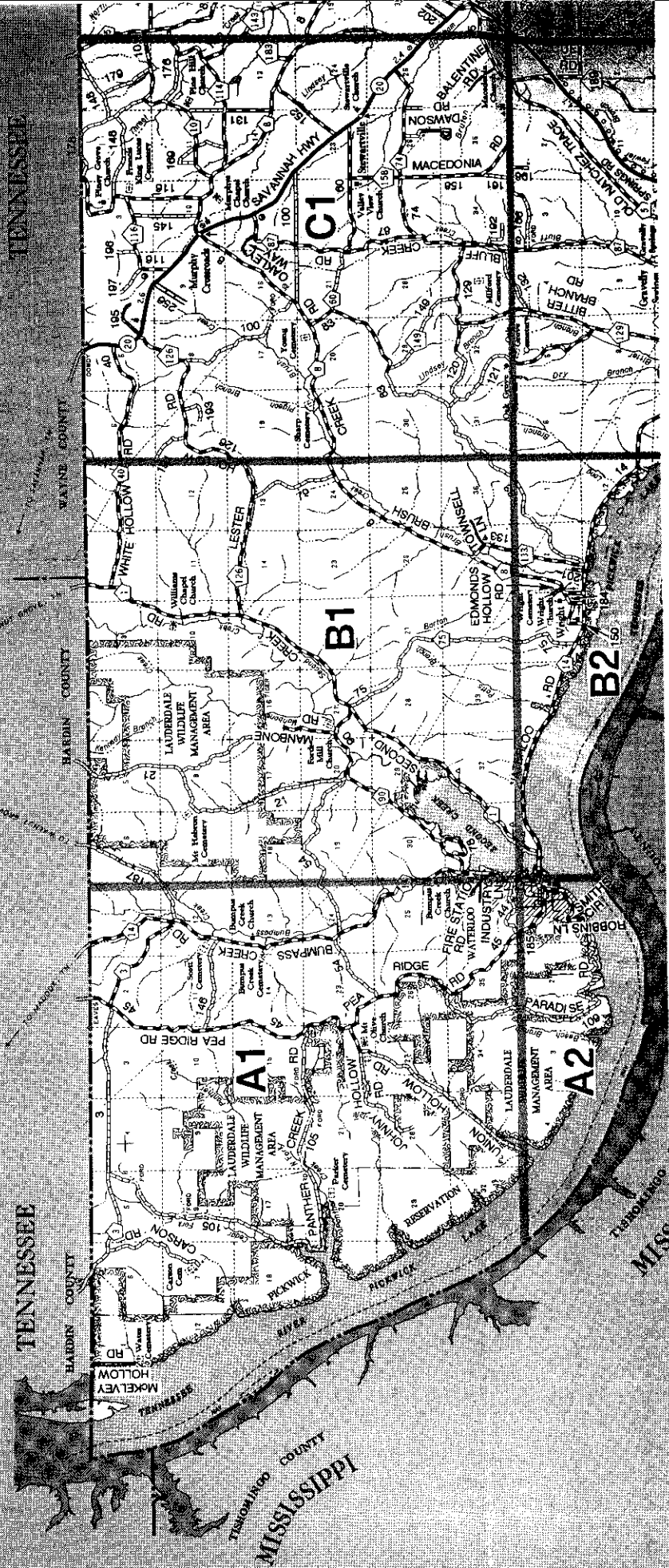
TENNESSEE

WAYNE COUNTY

HARDIN COUNTY

HANDICAPED COUNTY

TISHOMINGO COUNTY
MISSISSIPPI



126	B,C1	224	E,F1	332	F1	447	G2	542	H2
127	E1	225	I2	333	F,G1	448	H1	543	H2
128	C2,3	226	D2	334	F2	450	H2	544	I2
129	C1,2	227	D3	336	F1	452	H2	545	I1,2
130	F,G1	228	D2	337	F1	453	H2	546	I2
131	C1	229	E3	338	F1	454	G2	547	I2
132	C2	231	D2	339	F1	456	G1	548	I2
133	B1,2	232	D2	340	G1	457	E2	549	I2
134	I1	234	D2	341	F1	458	G1	550	I2
135	F1	235	D2	342	F1	459	G2	551	I2
136	G,H1	236	D2	343	F1	460	G2	552	I2
137	D2,3	238	D2	344	F1	461	G2	553	I2
138	E2	239	D1	345	F1	462	G,H1	553	I3
139	D,E1	241	D2	346	F1	464	G1	554	I2
140	G1	243	D2	347	F1	465	G2	555	I2
141	D1	245	D3	350	F2	466	G2	556	I2
142	E1	247	E3	353	F1	467	G1	558	I2
143	C,D1	248	E3	354	F1	468	G2	559	I2
144	G1	249	E3	355	F2	469	G1	560	I2
145	C1	251	D2	356	F2	470	G2,H1	561	I2
146	A1	252	E3	358	E2	471	G2	562	I3
148	C1	254	D2	361	F1	472	H1	563	I2
149	C1	255	D2	363	G1	473	G2	564	I3
150	B2	256	C1,D2	365	F1	474	G1	565	I2
151	D2	257	D1	366	F1	476	H1	566	I2
152	C1	258	D1	367	F3	479	G1	567	I2,3
153	H1	259	D,E1	369	G1	480	H1	568	H2
154	D1,2	260	E1	371	G1	481	G1	570	I3
155	I1	261	D1	372	G1	482	H1	571	H2
156	I1,2	262	D1	375	G1	483	H1	572	H2,3
158	C1,2	263	D1	377	G1	484	H1	573	H2
159	G1	265	D1	378	G1	485	H1	574	H2
160	H1	266	D1	379	G1	486	H1	575	H2
161	C1	267	D1	380	G1	487	H2	576	H2
162	D2,H1	268	E1	381	G1	488	H1	577	H2
163	E1	269	D1	382	G1	489	H1	578	H2
164	I1	271	D1	383	G1	490	H1	579	H2
165	I2,3	272	D1	384	G1	491	H1	580	H3
166	C2	273	E1	385	G1	492	H1	581	H3
167	H1	274	E2	386	G1	493	H1	582	H3
168	G1	275	E2	387	F1	494	H1,2	583	H2
169	C1	276	E1	388	G1	495	I1	584	H3
170	G2	277	D2	389	G1	496	H1	585	H3
171	G2	280	D2	390	G1	497	H1	586	H2
172	E1	281	D2	391	G1	498	H1	587	H2
174	G1	282	E2	392	G1	499	H1	588	H2
175	F1	283	D2	393	G1	500	H1	590	H1
176	C1	284	E2	394	F2	501	H1,1	591	H2
177	F1	285	E2	395	G1	502	H1	592	H2
178	C1	286	E2	396	G2	503	H1	593	H1
179	C1	287	E2	397	G2	504	I1	596	H2
180	C,D3	288	E2	398	F2	505	I1	597	H2
181	I1	289	E2	399	F1	506	H1	598	I1
182	D1	290	E2	400	F2	507	H1	600	H2
183	C1	292	E1	401	F2	508	I1	601	H2
185	A2	293	D2	402	F2	509	I1	602	H2
186	C2	294	D1	403	G2	510	I1	603	H2
187	B1	295	D1	404	F2	511	I1	604	I1
188	C,D3	296	D1	410	H3	512	I1	605	I3
189	C2,3	297	D1	411	G3	513	I1	606	I3
192	C1	298	E,F1	412	G3	514	I1	608	I3
193	C1	299	E,F1	413	G2	515	I1	610	I3
194	C2	300	E,F1	414	H2	516	I1	613	H1
195	C1	301	E1	415	G3	517	I1	614	H1
196	C1	302	F1	416	H2	518	I1	615	H2
197	C1	303	E,F1	417	G2	519	I1	616	I1
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207	I1	312	E2,F1	428	G2	527	I1	628	H2
210	D2	313	E1	429	G2	528	I1	629	I2
211	C3	314	F2	431	G2	529	I1	631	I3
212	D3	316	F1	432	G1,2	530	I1	632	I3
213	C2	317	F2	433	G2	531	I1	634	I3
214	D2	319	D1	434	G2	532	I1	635	I3
215	C2	320	F2	437	G2	533	I1,2	636	I2
216	D2	321	F2	438	G2	534	I2	637	I2
217	C2	322	F2	439	F1	535	I2	638	E2
218	D3	323	F2	440	G2	536	I2	639	E2
219	D2	324	F2	442	G2	537	H1	640	H1
220	D3	325	F2	443	G1	538	H2	641	G1




U. S. Post Office • Killen, Alabama 35645



Brooks Elementary

**Nobody
sells more
real estate.**



Re/Max Shoals

757-1001

1789 Hwy. 72 • Killen, Alabama

ap. Most of the county roads have been
his information. Names and numbers are



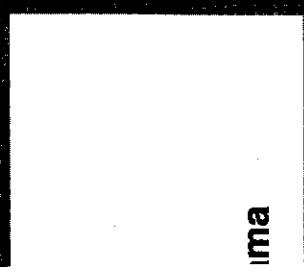
Brooks Elementary School



Killen Park Tennis Courts



Killen Park Playground



ima

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Dortch:

I am Pamela J White, administrator, Killen Public Library I have
been a resident of Killen for _____ years.

Based on my familiarity with the area, I can state that Killen is independent from the
Florence, Alabama Urbanized Area, and that I and other residents of Killen perceive Killen as
separate and distinct from the Florence Urbanized Area.

We urge the FCC to allow WKSJ-FM to change its community of license to Killen so
that we may have our own local radio station.

Pamela J White

12 E 600

12

12 E 600

12 E 600

12 E 600

STEVE HOWARD ASST. PRINCIPAL BROOKS High School
25

Steve Howard

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Dortch:

I am Ronald Pettus - Former Council Member
Owner of Pettus Museum I have
been a resident of Killen for 63 years.

Based on my familiarity with the area, I can state that Killen is independent from the Florence, Alabama Urbanized Area, and that I and other residents of Killen perceive Killen as separate and distinct from the Florence Urbanized Area.

We urge the FCC to allow WKSJ-FM to change its community of license to Killen so that we may have our own local radio station.

Ronald Pettus

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Dortch:

I am David McKelvey, Pastor of FBaptist Church, Killen. I have
been a resident of Killen for 4 years.

Based on my familiarity with the area, I can state that Killen is independent from the
Florence, Alabama Urbanized Area, and that I and other residents of Killen perceive Killen as
separate and distinct from the Florence Urbanized Area.

We urge the FCC to allow WKSJ-FM to change its community of license to Killen so
that we may have our own local radio station.

David McKelvey

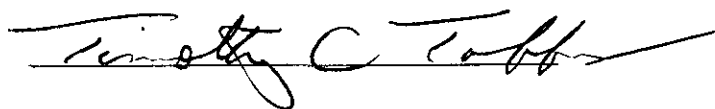
Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Dortch:

I am Timothy C. Tubbs City Council Member of Killen, Alabama. I have been a resident of Killen for 14 years.

Based on my familiarity with the area, I can state that Killen is independent from the Florence, Alabama Urbanized Area, and that I and other residents of Killen perceive Killen as separate and distinct from the Florence Urbanized Area.

We urge the FCC to allow WKSR-FM to change its community of license to Killen so that we may have our own local radio station.



Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Dortch:

I am Barbara Austin, City Council Member of Killen, Alabama. I have been a resident of Killen for 54 years.

Based on my familiarity with the area, I can state that Killen is independent from the Florence, Alabama Urbanized Area, and that I and other residents of Killen perceive Killen as separate and distinct from the Florence Urbanized Area.

We urge the FCC to allow WKSJ-FM to change its community of license to Killen so that we may have our own local radio station.

Barbara B. Austin

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Dortch:

I am Wonda Simpson, City Clerk of Killen, Alabama. I have been a resident of Killen for 11 years.

Based on my familiarity with the area, I can state that Killen is independent from the Florence, Alabama Urbanized Area, and that I and other residents of Killen perceive Killen as separate and distinct from the Florence Urbanized Area.

We urge the FCC to allow WKSJ-FM to change its community of license to Killen so that we may have our own local radio station.

Wonda C. Simpson

TECHNICAL EXHIBITS
IN SUPPORT OF THE INACCURATE COMMENTS FILED
IN DOCKET NO. 03-77

This report is in response to the Reply Comments filed in this proceeding. A Counterproposal was filed by Kea Radio, Inc. and Pulaski Broadcasting, Inc. The Reply Comments addressed the possibility that Kea Radio, Inc. would not satisfy the requirements of 73-315 which concerns the City Grade Coverage of the City of Scottsboro.

We have conducted a complete study on several possibilities. Based upon these studies and the Exhibits attached here to, we believe Cox Radio, Inc. and CXR Holdings, Inc. are wrong.

This firm has had an active part in the engineering and construction of just about every radio station on Sand Mountain and is well aware of how the mountain drop off affects signal coverage. No one can predict, with any accuracy, how mountainous terrain will affect an RF signal.

The site Kea Radio, Inc. chose for its hypothetical location is also the site we plan to use when we construct the station. The site was selected after many weeks of looking to find a good site where three phase power is available. On rural Sand Mountain a transmitter site does not need to be at the end of a single phase power line.

Kea Radio, Inc. plans to build a tower 150 meters above ground, or 500 feet high, therefore eliminating any line of sight problems. We conducted various studies before filing this Counter Proposal to determine if we would have line of sight to the studio.

The FCC requires that you propose a maximum class station in a Rule Making. How you obtain that maximum class is a decision that is left up to the engineer and management.

Exhibit I

Exhibit No. I is a map showing the Predicted City Grade Contour based upon 72 Radials. From this map it can be determined that 98 percent of the land area of the City of Scottsboro is covered and 100% of the City's population is covered by this contour. The land area that may not be covered has no population. There is only one road in the area of study. It is a dead end field road beyond a locked gate.

Exhibit II

Exhibit No. II is a Topographical Map showing the area in dispute.

Exhibit III

Exhibit No. III is a map generated by computer. This map illustrates that Kea Radio, Inc. covers 100 percent of the city boundaries of Scottsboro and beyond

The Commission has a current policy of allowing Tech Note 101 - Longley Rice to be utilized to calculate contours where the Delta H. Factor exceeds 100. All the radials under consideration in this proposal exceed that limit. Therefore this Exhibit is based upon the Longley Rice method of calculation, and clearly indicates beyond any doubt that it meets and exceeds the requirement of 73-315.

Exhibit IV

Exhibit No. IV is a Topographical Map which illustrates the area that Cox Radio, Inc. and CXR Holdings, Inc. believes Kea Radio, Inc. does not cover. With this being the worse case scenario our proposal still covers 99.998 percent of the population of Scottsboro, and this rounds off to 100 percent. The area in dispute is brought about by how one interprets terrain and contour calculations.

Exhibit V

As can be seen from Exhibit No V, using the new coordinates the City Limits contour or the 23.24 kilometers distance falls below the 50 percent level in the urbanized area of the Quad Cities. Taking this fact into account the city grade contour falls below the fifty percent level in the urbanized area.

Exhibit VI

Exhibit No VI is an allocation study which shows the site that could be used to alleviate a large part of the overlap with the proposal at Ashland, Alabama. Ashland would only have to move 1.54 kilometers to clear this site for WKEA at Scottsboro. From this site a 70 dbu contour can be placed over the city of Scottsboro with out any obstruction using the standard 100 meter tower . Also, by using the uniform Class C3 reference 70 dbu contour 23.24 kilometers encompasses the entire city. This is illustrated in Exhibit VII.

Exhibit VIII

Exhibit No VIII is a computer print out showing the site where WKSR can locate and meet all of the spacing requirements of 73.207. From this site WKSR will generate a coverage contour greater than 70 dbu over Killen. Using the so called uniform standard for a maximum Class C3, which is 23.24 kilometers. This contour will also be placed over the city of Killen. A map illustrating this is included as Exhibit IX.

Exhibit X

Exhibit No X is another computer print out illustrating the site where Ashland could locate and meet all of the spacing requirements and allow WKEA and WKSR to up-grade to a Class C3. This would bring a new service to over 200,000 people. This would only require the proposal at Ashland to make a slight change in their hypothetical coordinates. The Commission can, on it's own initiative, change the reference coordinates for the Ashland allocation allowing this rule making to go forward accomplishing all of the proposals set forth in this proceeding.

Exhibit XI is a topographical map which shows Ashland's present hypothetical site and the site that would eliminate the short spacing. As can be determined by this map, both have practically the same ground levels. Exhibit XII is a map depicting the service contours of the two different sites and a comparison of the areas to be served.



Olvie E. Sisk

Sisk Engineering, Inc.

P. O. Box 2116

Tupelo, MS 38803

ASSUMPTIONS USED WHEN USING LONGLEY-RICE TO CALCULATE CONTOURS

TIME %...50.0

LOCATION %...50.0

CONFIDENCE %...50.0

CONDUCTIVITY (S/m)...0.0050

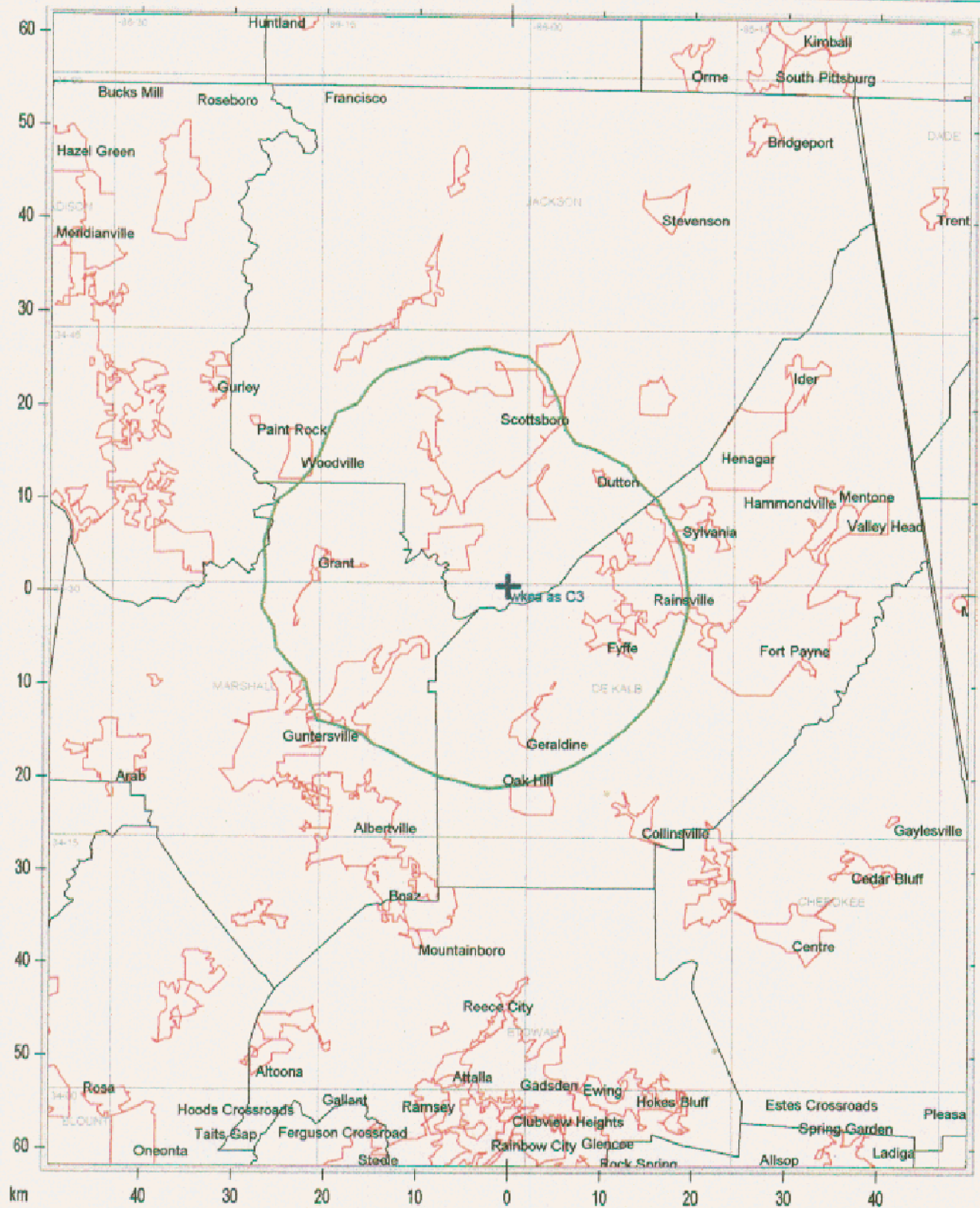
DIELECTRIC CONSTANT...15.00

CLIMATE ZONE...CONTINENTAL TEMPERATE

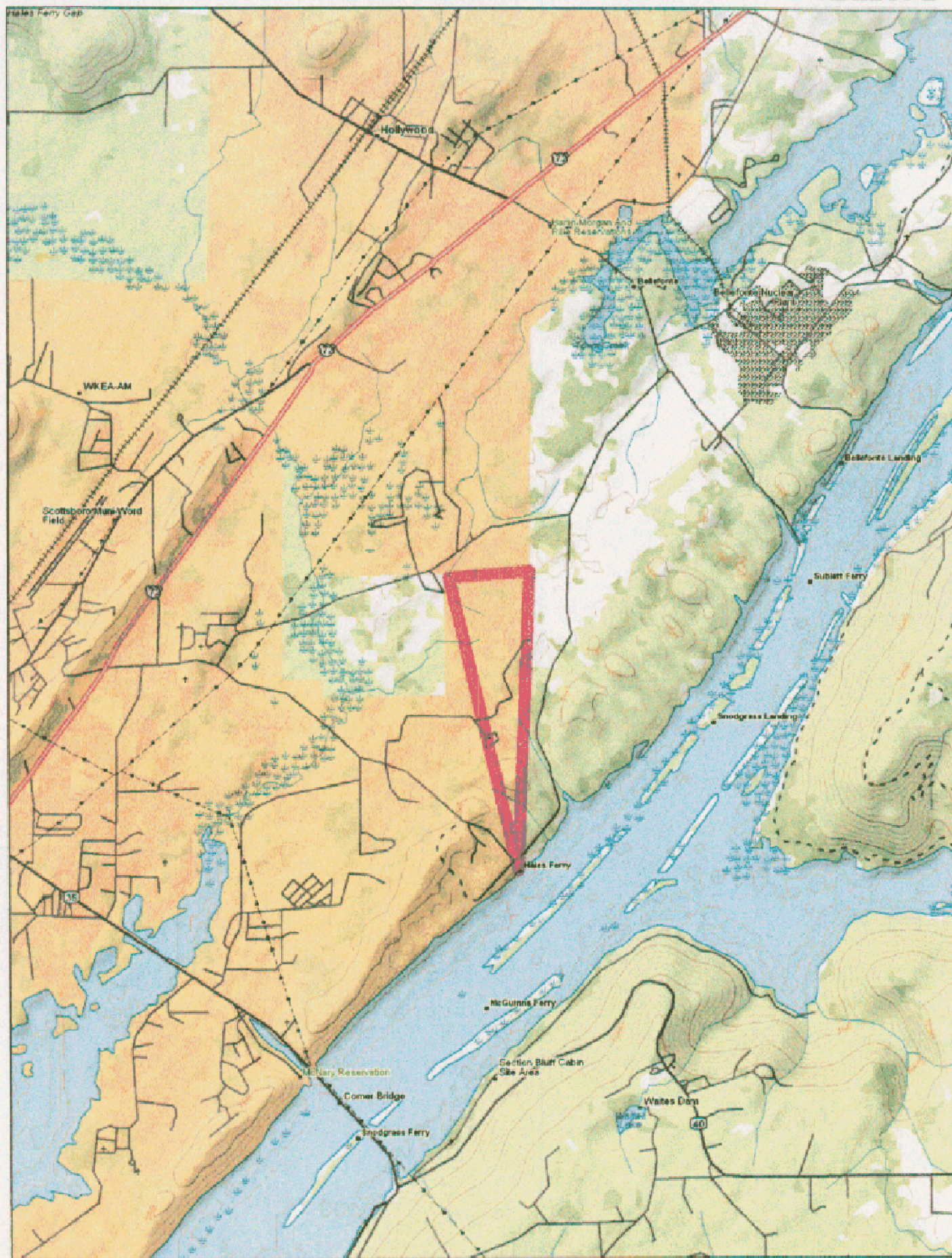
SERVICE APPLICATION...BROADCAST

RECEIVER HEIGHT...9 METERS

LAND USE ATTENUATION...NOT UTILIZED

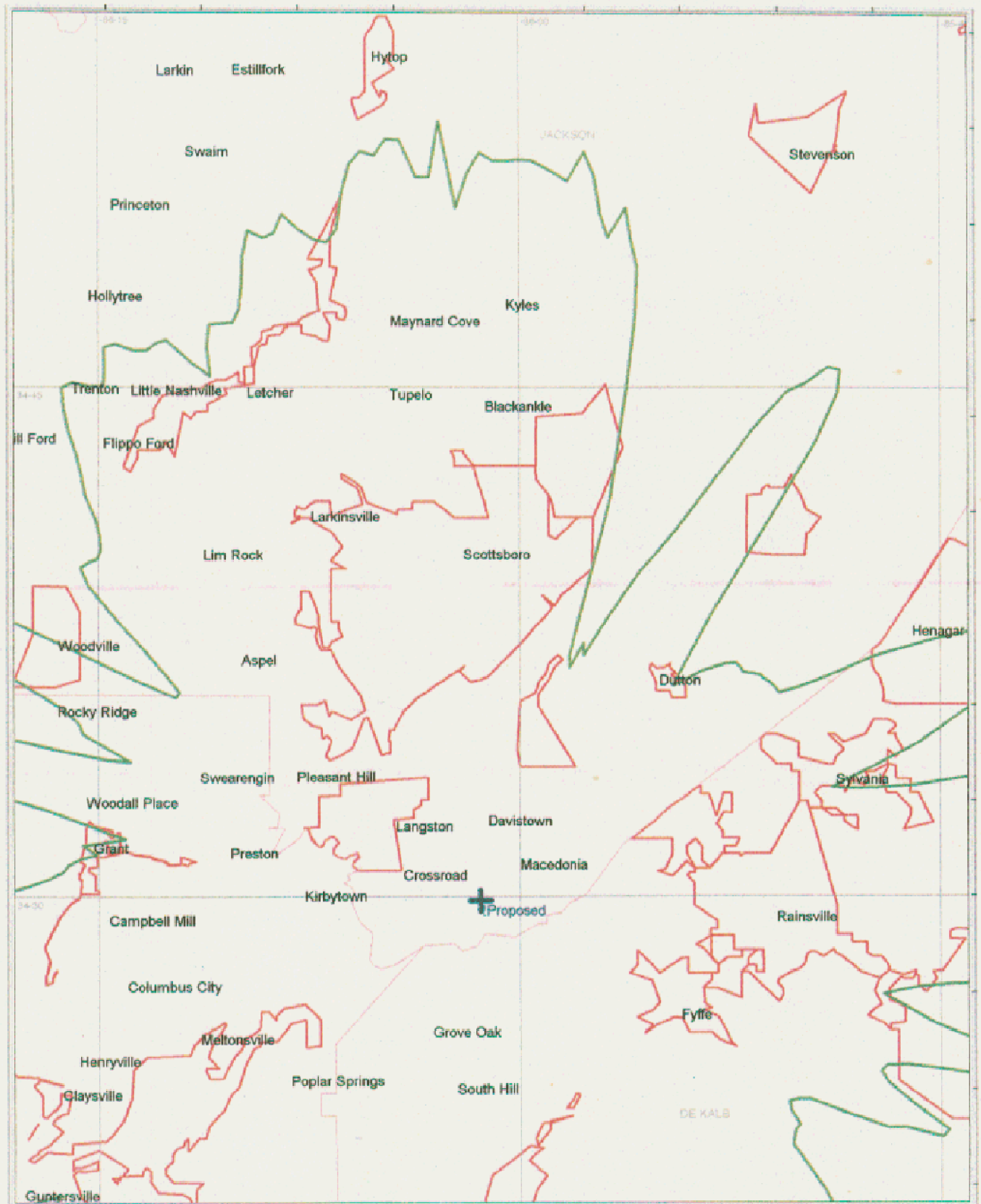


County Borders State Borders City Borders Highways Lat/Lon Grid



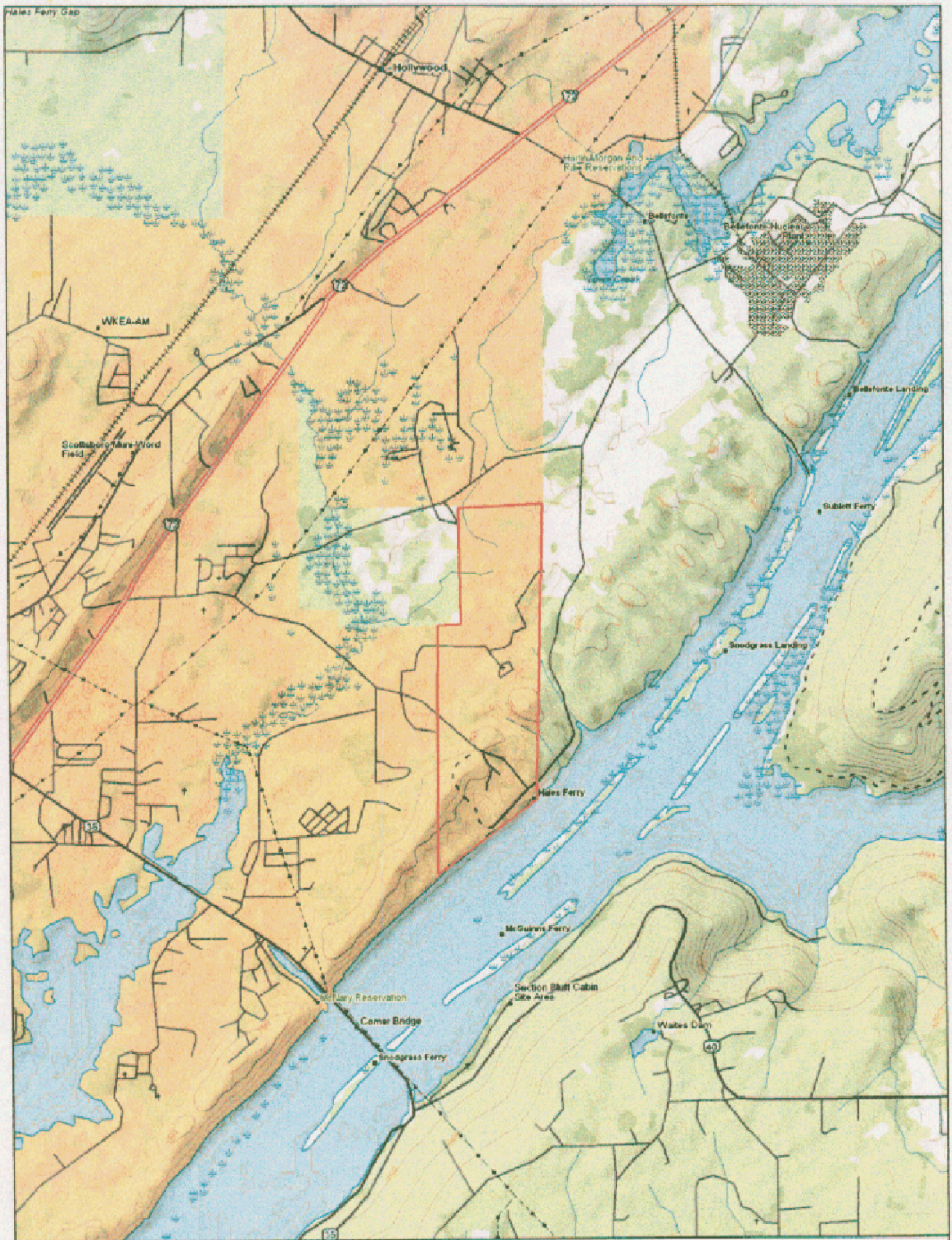
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1" = 4170 ft





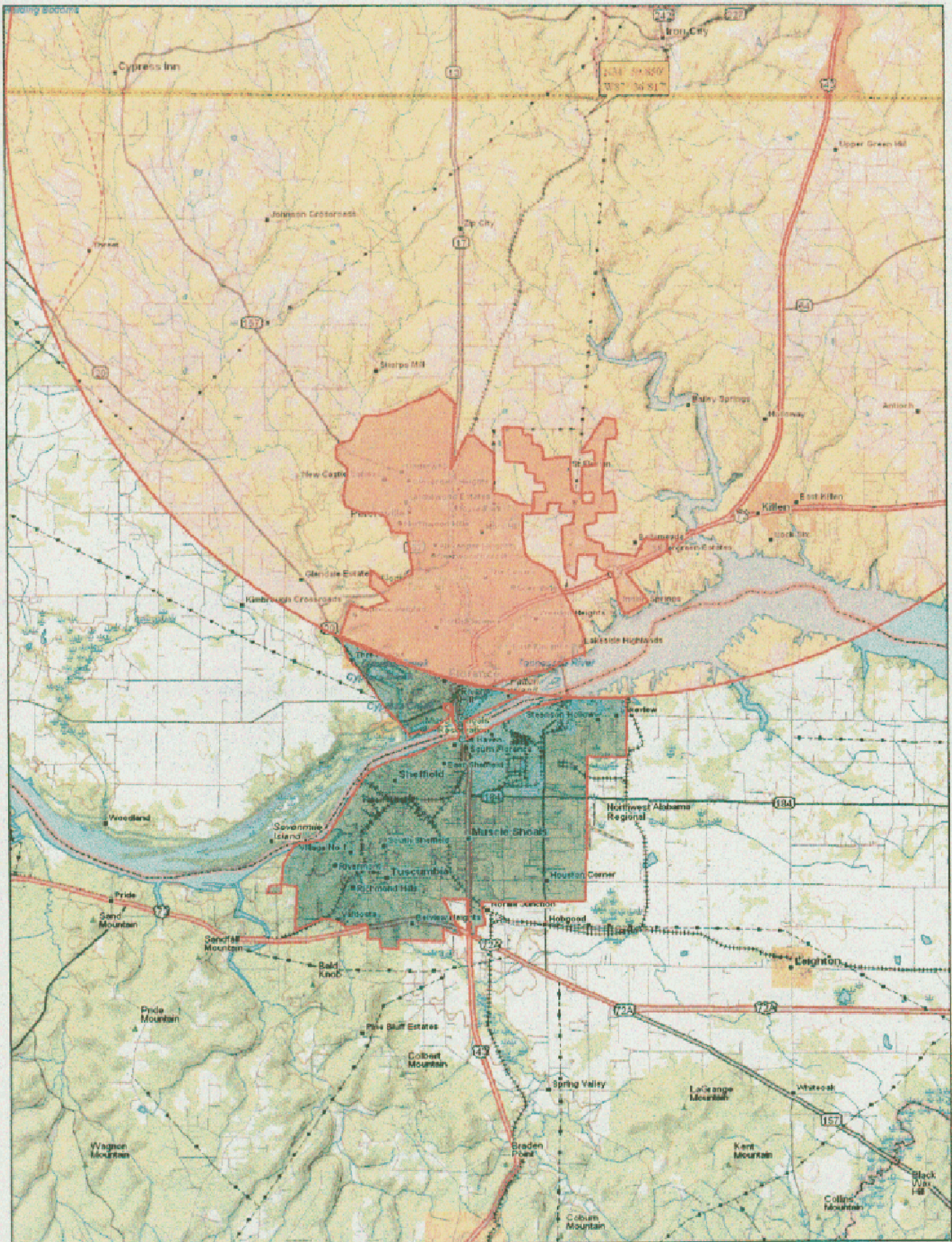
km

County Borders State Borders City Borders Highways Lat/Lon Grid



Scale 1 : 50,000
1" = 4170 ft





Scale 1 : 200,000

1" = 3.15 mi



WKEA SITE

EXHIBIT 6

REFERENCE

34 31 08 N

86 02 40 W

CLASS = C3

Current Spacings

DISPLAY DATES

DATA 06-07-03

SEARCH 06-23-03

----- Channel 252 - 98.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
RDEL	DEL 252A	Scottsboro	AL 9.19	31.5	142.0	-132.81
WKEAFM	LIC 252A	Scottsboro	AL 9.19	31.5	142.0	-132.81
RADD	ADD 252A	Ashland	AL 141.53	174.6	142.0	-0.47
WKXJ	LIC-Z 251A	Signal Mountain	TN 88.72	44.3	89.0	-0.28
WKS RFM	LIC 252C3	Pulaski	TN 153.17	290.8	153.0	0.17
RDEL	DEL 253C	Atlanta	GA 178.80	117.7	176.0	2.80
WSB-FM	LIC 253C	Atlanta	GA 178.80	117.7	176.0	2.80
RDEL	DEL 252A	Sylacauga	AL 160.78	184.1	142.0	18.78
WTRBFM	LIC 252A	Sylacauga	AL 160.78	184.1	142.0	18.78
WKLD	LIC-N 249A	Oneonta	AL 75.34	212.6	42.0	33.34
ALLO	RSV 254C1	Warrior	AL 111.35	219.3	76.0	35.35
WKCX	LIC-Z 249C3	Rome	GA 81.27	112.7	43.0	38.27
WLODFM	LIC 252A	Sweetwater	TN 188.84	49.4	142.0	46.84
WBHK	LIC-N 254C1	Warrior	AL 134.64	211.6	76.0	58.64
WVOKFM	LIC 250A	Oxford	AL 100.73	170.9	42.0	58.73
WTXT	LIC 251C1	Fayette	AL 207.95	230.7	144.0	63.95
WQMT	LIC-Z 255A	Chatsworth	GA 110.82	71.6	42.0	68.82
WGIC	LIC-N 253C2	Cookeville	TN 187.65	16.0	117.0	70.65
RADD	ADD 255A	Tallapoosa	GA 120.19	142.7	42.0	78.19
RADD	ADD 253C3	Atlanta	GA 178.80	117.7	99.0	79.80
WSIXFM	LIC 250C	Nashville	TN 183.98	337.5	96.0	87.98



WKSJ SITE

EXHIBIT 8

REFERENCE

34 59 51 N

87 36 49 W

CLASS = C3

Current Spacings

Channel 252 - 98.3 MHz

DISPLAY DATES

DATA 06-07-03

SEARCH 06-23-03

Call	Channel	Location	Dist	Azi	FCC	Margin		
WKSJFM	LIC	252A	Pulaski	TN	50.44	70.7	142.0	-91.56
RDEL	DEL	252A	Pulaski	TN	50.44	70.7	142.0	-91.56
RADD	ADD	253A	Linden	TN	71.76	343.5	89.0	-17.24
WKEAFM	LIC	252C3	Scottsboro	AL	153.17	109.9	153.0	0.17
RDEL	DEL	252A	Scottsboro	AL	153.17	109.9	142.0	11.17
WKEAFM	CP -Z	252A	Scottsboro	AL	160.30	101.7	142.0	18.30
WZLQ	LIC	253C1	Tupelo	MS	168.83	237.3	144.0	24.83
WSIXFM	LIC	250C	Nashville	TN	136.40	31.1	96.0	40.40
WTTT	LIC	251C1	Fayette	AL	186.51	184.6	144.0	42.51
ALLO	VAC	250A	Marietta	MS	94.41	234.8	42.0	52.41
WSRIFM	LIC	251C1	Millington	TN	202.19	275.6	144.0	58.19
WKXMF	APP-Z	249A	Winfield	AL	108.55	189.2	42.0	66.55
RADD	ADD	249A	Winfield	AL	111.55	185.4	42.0	69.55
ALLO	RSV	254C1	Warrior	AL	157.77	151.9	76.0	81.77

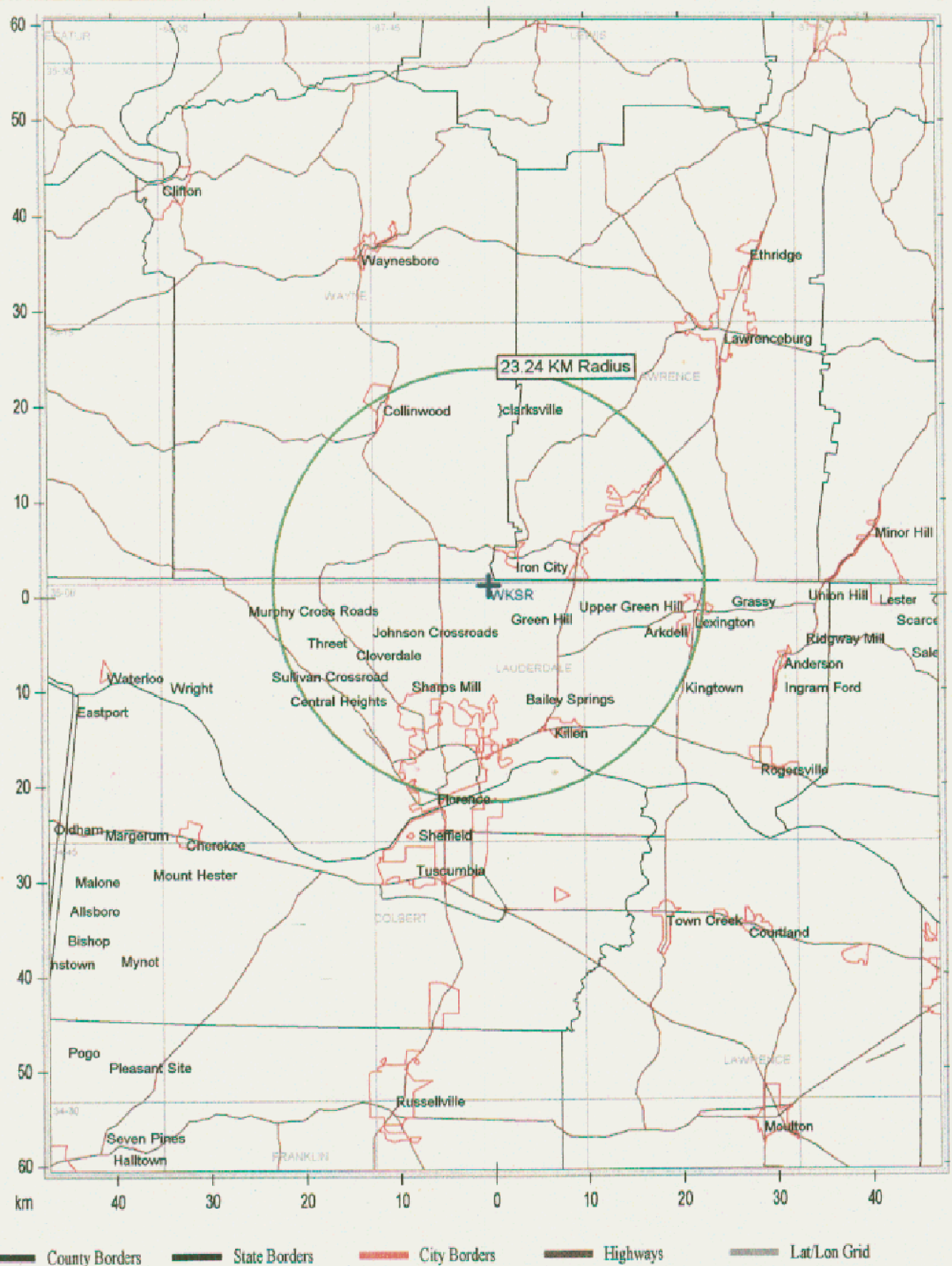


EXHIBIT 10

REFERENCE

33 14 55 N

85 54 00 W

CLASS = A

Current Spacings

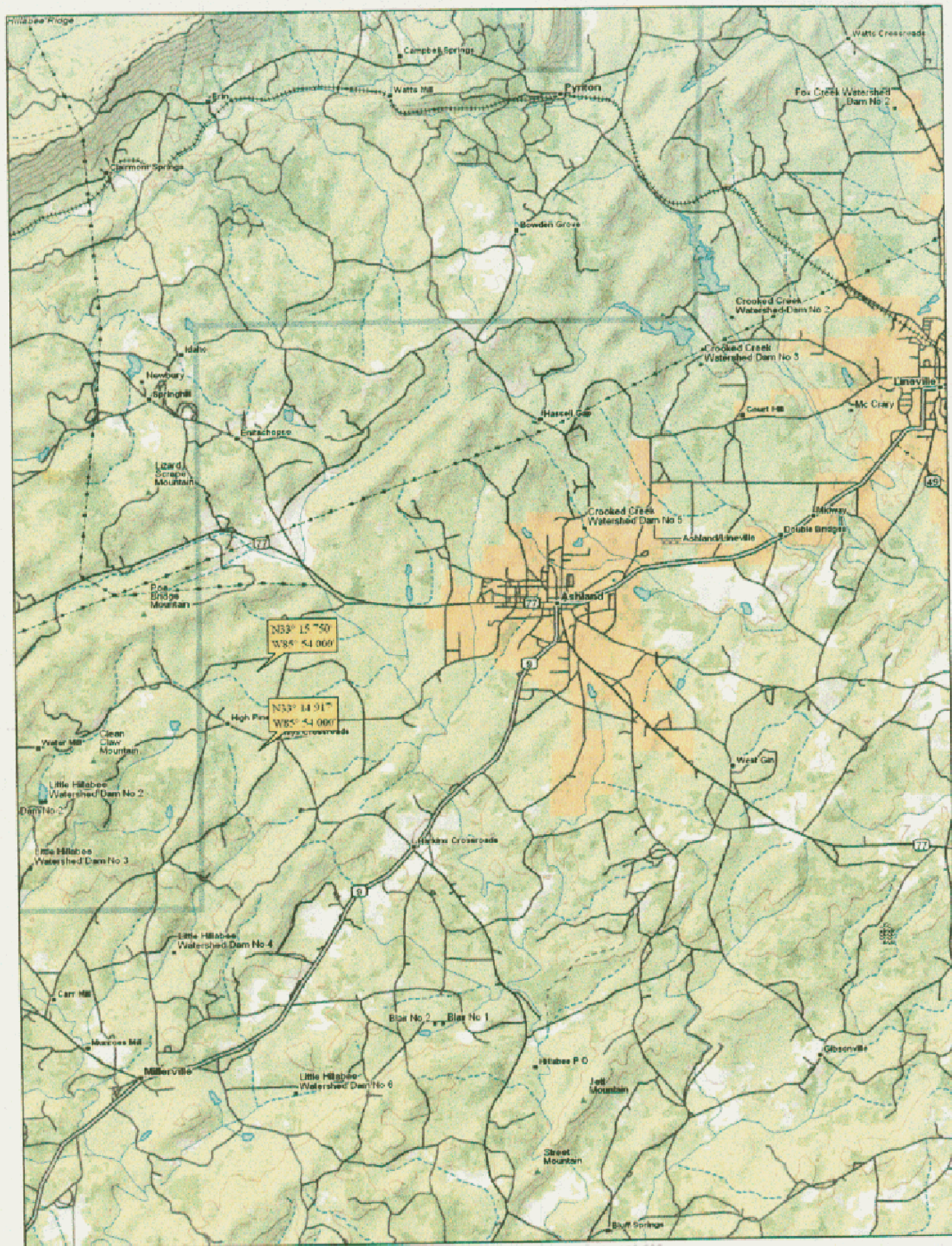
DISPLAY DATES

DATA 06-07-03

SEARCH 06-18-03

----- Channel 252 - 98.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
RADD	ADD 252A	Ashland	AL 1.54	0.0	115.0	-113.46
RDEL	DEL 252A	Sylacauga	AL 31.71	232.1	115.0	-83.29
WTRBFM	LIC 252A	Sylacauga	AL 31.71	232.1	115.0	-83.29
WSB-FM	LIC 253C	Atlanta	GA 156.08	68.2	165.0	-8.92
RDEL	DEL 253C	Atlanta	GA 156.08	68.2	165.0	-8.92
WKEAFM	LIC 252C3	Scottsboro	AL 141.53	354.6	142.0	-0.47
WMGP	LIC-Z 251C3	Hogansville	GA 90.35	102.8	89.0	1.35
RADD	ADD 253C0	Atlanta	GA 156.08	68.2	152.0	4.08
RADD	ADD 252C1	Ardmore	AL 205.41	336.4	200.0	5.41
WTTT	LIC 251C1	Fayette	AL 141.53	354.6	133.0	8.53
WVOKFM	LIC 250A	Oxford	AL 41.52	3.6	31.0	10.52
WAGH	LIC 252A	Fort Mitchell	AL 126.30	140.9	115.0	11.30
WBHK	LIC-N 254C1	Warrior	AL 88.37	287.5	75.0	13.37
ALLO	RSV 254C1	Warrior	AL 100.58	303.3	75.0	25.58
RDEL	DEL 252A	Scottsboro	AL 148.96	356.8	115.0	33.96
RADD	ADD 255A	Tallapoosa	GA 74.87	52.6	31.0	43.87
WKEAFM	CP -Z 252A	Scottsboro	AL 160.22	360.0	115.0	45.22
WEZZFM	LIC 249A	Clanton	AL 86.09	237.9	31.0	55.09
RDEL	DEL 249A	Clanton	AL 86.09	237.9	31.0	55.09
RADD	ADD 249A	Jemison	AL 88.12	247.3	31.0	57.12
WKKR	LIC 249A	Auburn	AL 90.57	146.8	31.0	59.57
WJWZ	LIC-Z 250A	Wetumpka	AL 92.96	198.2	31.0	61.96
WJWZ.C	CP -Z 250A	Wetumpka	AL 93.43	198.2	31.0	62.43
WKLD	LIC-N 249A	Oneonta	AL 94.57	325.2	31.0	63.57
WBAMFM	LIC 255C1	Montgomery	AL 143.93	191.0	75.0	68.93
WINL	LIC 253C1	Linden	AL 212.31	234.5	133.0	79.31
WKCX	LIC-Z 249C3	Rome	GA 125.77	29.3	42.0	83.77



Scale 1 : 100,000
1" = 1.58 mi



